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RE: Comment on the application for Private Exclusive Easement for the Ambler Road(ADL 421741) and the Public Review Draft of the Ambler Road Site Specific Plan

Dear Ms. Brudie and Mr. Leland:

I would like to provide my comments on the application for the Private Exclusive Easement for the Ambler Road (ADL 421741) and the Public Review Draft of the Ambler Road Site Specific Plan.

Let me start by telling you who I am and why I care. I am a resident of Alaska and currently reside in the Anchorage area. I have also lived in rural Alaska, was a resident of Kotzebue, and a subsistence user in Northwest Alaska. I have traveled throughout the area in all seasons of the year.

I retired from the Federal Subsistence Program, where I worked on subsistence management and regulations throughout Alaska. During this time I attended many public meetings and listened to concerns from subsistence users, scientists and other members of the public about the changes they are seeing in respect to climate change. Many of the speakers were residents who had lived in their community all their lives, and come from families that have generations of knowledge about the land and its resources. Concerns about climate change were raised and how that affected their ability to adequately harvest for the subsistence needs of their families.

I think in the rush to obtain this "Private Exclusive Easement" and to rush through a review on the application for the road, the importance of subsistence in this area is being devalued and environmental impacts are not being adequately addressed. The full scale of the project is not being considered. Once again, the application and environmental review process seems to be using the same tactic which was reported to have been attempted by the Pebble Mine proponents on their plans. Which was to deliberately minimize and piecemeal the full extent of the project, so that once the first step was authorized, the subsequent expanded plans would be presented as only marginally different and simply rubber stamped as "approved."

A review of stage one of the Ambler Road plans, without a review of the full longterm plans, appears to be an attempt to downplay the potential environmental and subsistence impacts of a road that will cross 2,900 streams, 11 major rivers and 1,700 acres of wetlands. Furthermore, a review of the road plan without looking at the cumulative effects, which include the mine or multiple mine sites, would not provide a complete analysis of the future environmental impacts to this region, the potential impacts to the subsistence resources and the users of those resources. The review of the draft Ambler Road Site Specific Plan should be rejected until the

complete plan is available and the full extent of the impacts can be reviewed. Climate Change and future projections of those changes should play a greater role in this analysis. The Alaska Center for Climate Assessment and Policy might be a good first stop for gathering this type of information.

The application for a Private Exclusion Easement should be denied. It appears to be an attempt to minimize the impacts of a major new road across Northwest Alaska and could provide a false sense of assurances for the future. If history teaches us anything, then perhaps we could look back, to access issues on the Haul Road, as an example of how a limited access road was eventually opened to all traffic. An excerpt from a story printed on June 10, 1981, by Wallace Turner, in the New York Times provides this history:

“The Alyeska Pipeline Company had to build the road before it could build the pipeline, and when the highway opened in 1974, traffic was limited beyond the Yukon to vehicles involved in the pipeline construction. Later, traffic was restricted by permits to about 200 trucks a day carrying supplies to the oil camps built by the petroleum companies on the frozen Arctic plain.

At midnight May 31, after four years of disputes among several interests, a stretch 150 miles north of the Yukon was opened to all traffic. 25 Vehicles the First Week.

No more than 25 vehicles exercised the new privilege in the first week the road was open, by the estimate of Patty Christiansen, a highway department employee, who hands out leaflets to those about to set off up the highway with the warning: "Feeding animals is dangerous. Violators will be prosecuted."

A clamor over opening the road began when the state took control of it on completion of the pipeline in 1977. Sportsmen wanted access to remote fishing and hunting areas. Business interests thought opening it might help the state's economy. Miners wanted to get to their claims.

But truckers believed tourists would create traffic hazards. Indians and Eskimos wanted to keep people out of their hunting areas, believing that whites who shoot for trophies and not for the meat would deplete the game. Safety-conscious officials worried about tourists coming onto the highway, unfamiliar with the country, and ill-equipped to look after themselves.

"I resisted it being thrown wide open," said Gov. Jay Hammond. "I wanted it opened in stages." That was what a Superior Court judge in Fairbanks ordered done in late winter. 150 Desolate Miles."

In summary, I thank you for the opportunity to provide comments and urge you to deny the application for the Private Exclusive Easement. No site plan for the Ambler Road should be considered for review or approval until the full scope of the Ambler Road plans are submitted for public review.

Sincerely,

Kathleen M. O'Reilly-Doyle